

# **EXHIBIT B**

Response for Angelo Williams lawsuit 9/18/14

Grievance:

Safeway presently holds the City contract for New Rochelle.

I have been in business with my company, Avalon Towing, since 2002.

Since the new law was implemented, I have personally witnessed two other competitor's go out of business. The law states that a company must hold at minimum a two million dollar insurance policy (a policy costs approximately \$2,800 per month, a yard within the City limits, which costs approximately 5k per month, Fee for license \$750 and I must take credit card payments which customers call their banks afterward and stop payment. That's why this is a cash business. The difference between the rules that New Rochelle and Safeway have are different from what private property companies have to follow, The City of New Rochelle collects the cash for Safeway . Only a big company like Safeway can afford to survive with this new law. All small businesses can not survive this new law and it helps Safeway to monopolize all the towing and booting . It seems to me that this is a clear presence of monopolization as far as I can remember for the past 35 years.

This new law that has been implemented I should be exempt from because I've been in for 12 years. I should be grandfathered in from the new law. That would assist me in remaining in business. As of now, I can't afford the insurance and I can't even get a policy because the insurance requires that I have a tow company even though I only boot cars.

This is a infringement on private property.

The law states that if any animal or person is in the vehicle, you can't boot or tow indefinitely.

This law is silly. If someone parked in your driveway behind your vehicle and left a parakeet, I would be unable to boot or tow the vehicle.

Can you imagine if you came out to go to work and were unable to do so and this scenario was in play?

They also named between 17 and 19 cars that can park in your parking lot at anytime in a non -emergency capacity. Makes no sense and violates our rights.

Also, they enacted a law that says I must release a boot within 15 minutes from the time they call me. Scenario I work in White Plains about 25 minutes from New Rochelle without traffic. I get a call because the car 8 hours ago. Now I'm in White Plains. It's impossible for me to get back. This is a way for them to write a City code violation.

Safeway makes a million dollars a year compared to my \$50,000 per year, but I'm held to the same rules and regulations but as you can see below there is a huge disparity in what Safeway is allowed to charge for the City of New Rochelle.

Safeway also gets special privileges. They never get City code violations or harassed by the City of New Rochelle police department.

Below is the pricing allowed for the following services:

**Safeway**

Towing	\$140
Booting	\$110 (+ sticker \$26)
Storage	\$25 per day
Fee per mile	\$8

**Avalon Towing**

Towing	\$65
Booting	( \$45) no sticker fee
Storage	\$5 per day
Fee per mile	\$1.25

The City of New Rochelle and the police department has prevented me from prospering through harassment tactics and favoritism towards Safeway towing the company that they've contracted to do the towing and booting. All the City lots, all the City streets, all the booting for tickets, all the towing, all aspects they have monopolized. Safeway has not even thrown a percentage to smaller companies, which breaks Federal laws.

I have gone the City Council three times asking to be able to be on the same playing field as Safeway, was denied each time. They are fully aware that Safeway and Avalon have the same operating costs but they are allowed to charge much more than I am.